

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PRINCESS CEDENO

Plaintiff

Civil Action No. 1:13-cv-12510-JGD

V.

Cedeno v. Calvary Portfolio Services, LLC et a L

FILED
CLERKS OFFICE
2013 DEC 10 P 2:47
U.S. DISTRICT COURT
DISTRICT OF MASS.

PLAINTIFFS AFFIDAVID

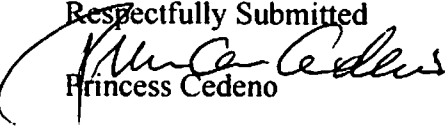
The plaintiff Princess Cedeno, comes before this court with this **Motion for Entry of Default Judgment** against Defendant **Allied Collection Services**, and states as follows:

1. I am the Prose Plaintiff in the above-entitled action and I am familiar with the file, records and pleadings in this matter. Plaintiff has made all filings required by this court to bring a cause of action against the Defendant **Allied Collection Services**, for damages under the FCRA 15 USC 1681 et seg, Telephone Consumer Practices ACT 47 U.S.C. §227(b)(3)(A), FDCPA, 15 U.S.C. §1692, MFDCPA 332.33-355- 332.37
2. Plaintiff has made proper service of the summons and complaint to the defendant **Allied Collection Services** as evidenced by the proof of mailing Docket 13.
3. The time for the defendant to respond is past and there has been no response to the service of summons and complaint in this matter and defendant is therefore in default.
4. Plaintiff has made a request for Clerks entry of default judgment and it was granted on December 3, 2013.

5. The Defendant Allied Collection Services violated the Fair credit reporting act by pulling plaintiff credit report without a permissible purpose & violated the Federal Debt Collection Practices Act as well.
6. The Defendant Allied Collection Services violated the Telephone Consumer Practices act by calling plaintiff cell phone, home phone and business phone with an automatic dialing system and did not have consent to call from plaintiff.
7. The Defendant Allied Collection Services violated the Massachusetts Unfair & Deceptive Trade Practices Act & the Massachusetts Debt Collection Regulation Act 940 CMR 7.00 as well.
8. Below is a list of violations and amount the plaintiff is seeking from the defendant Allied Collection Services for defaulting.
 - A. Fair Credit Reporting Act. \$1000.00
 - B. Federal Debt Collection Practices Act. \$1000.00
 - C. Telephone Consumer Practices Act. \$7,000,
 - D. Massachusetts Debt Collect Regulation Act \$1000.00
 - E. MGL 93a \$1000.00
 - F. Cost to bring this action \$400.00

Total Amount: \$11,400.00

Respectfully Submitted


Princess Cedeno

140 Palisades Circle

Stoughton, Ma 02072

857-829-4504

princessclaims@gmail.com

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DISTRICT OF MASSACHUSETTS

PRINCESS CEDENO

Plaintiff

Civil Action No. 1:13-cv-12510-JGD

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Calvary Portfolio Services, LLC et a L

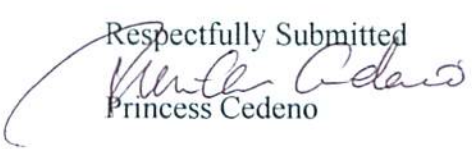
STATEMENT OF COST INCURRED BY PLAINTIFF

CLERKS FEE FOR FILING COMPLAINT \$400.00

COST OSF SERVICE OF SUMMONS AND COMPLAINT **Allied Collection Services**

TOTAL COST INCURRED \$400.00

Respectfully Submitted



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PRINCESS CEDENO
Plaintiff(s)

v.

CIVIL ACTION NO. 13-12510-JGD

CAVALRY PORTFOLIO SERVICES, LLC

Defendant(s)

FORM OF
DEFAULT JUDGMENT

Defendant **Allied Collection Services** having failed to plead or otherwise defend in this action and its default having been entered, Now, upon application of plaintiff and affidavits demonstrating that defendant owes plaintiff the sum of \$ 11,000 (Statutory damages) that defendant is not an infant or incompetent person or in the military service of the United States, and that plaintiff has incurred costs in the sum of \$400.00.

It is hereby ORDERED, ADJUDGED AND DECREED that plaintiff recover from defendant the principal amount of \$1100.00 with costs in the amount of \$ 400.00 and prejudgment interest at the rate of 6% from 10/15/2013 to date paid in the amount of \$ 11,400 for a total judgment of \$11,400.00 with interest as provided by law.

Wherefore, the Plaintiff respectfully moves the court to enter an order of default judgment against the defendant, **Allied Collection Services** in the amount of \$11,000

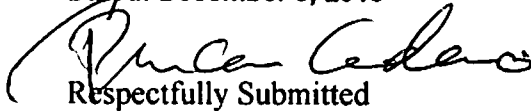
for statutory damages as well as \$400.00 the cost to bring this action as stated in the annexed bill of cost and for which let execution issue.

By the Court,

Deputy Clerk

NOTE: The post judgment interest rate effective this date is 6 %.

Dated: December 9, 2013


Respectfully Submitted

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